# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

	SPORTS CO., LTD., ONE GOLF, INC.,	) ) )
	Plaintiffs,	) C.A. No. 05-132 (JJF)
v.		)
ACUSHNET CO	MPANY,	)
	Defendant.	)

# BRIDGESTONE'S REVISED SECOND NOTICE OF DEPOSITION PURSUANT TO RULE 30(b)(6)

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiff Bridgestone Sports Co., Ltd. ("Bridgestone") shall take the deposition upon oral examination under oath of Defendant Acushnet Company ("Acushnet") beginning at 9:00 a.m., on the 19th day of May, 2006, and continuing from day to day until completed, in the offices of Paul, Hastings, Janofsky & Walker LLP, 875 15th Street, NW, Washington, DC 20005, or at such other time and place as may be agreed upon by counsel. The deposition will be recorded by stenographic means and may be videotaped, and is being taken for the purposes of discovery, for use at trial, and for such other purposes as permitted under the Federal Rules of Civil Procedure.

In accordance with Rule 30(b)(6), Acushnet shall designate one or more officers, directors, managing agents, or other persons to testify on its behalf concerning the matters set forth in Attachment A hereto.

# MORRIS, NICHOLS, ARSHT & TUNNELL LLP

# /s/ Maryellen Noreika

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May 16, 2006

#### ATTACHMENT A

Notwithstanding any definition set forth below, each word, term, or phrase used in this Notice of Deposition is intended to have the broadest meaning permitted under the Federal Rules of Civil Procedure.

### **DEFINITIONS**

As used herein, the following terms are to be interpreted in accordance with the DEFINITIONS set forth in Bridgestone's First Set of Requests For Production of Documents and Things (Request Nos. 1-100) as though fully set forth herein.

In addition, the following phrase in this Notice is to be interpreted in accordance with the following definition:

37. The phrase "Related Patents or Applications" means any patents or patent applications, whether issued, pending, abandoned, or otherwise, related to a patent, including any parents, continuations, continuations-in-part, divisions, provisionals, reexaminations, reissues, and foreign counterparts.

#### MATTERS ON WHICH EXAMINATION IS REQUESTED

- 1. The conception, reduction to practice, diligence up to reduction to practice and other development activities or alleged inventive activities for the subject matter of the '861 patent including the claims of the '861 patent.
- 2. The preparation, filing and prosecution of the application which resulted in the issuance of the '861 patent and its Related Patents or Applications.
- 3. The conception, reduction to practice, diligence up to reduction to practice and other development activities or alleged inventive activities for the subject matter of the '587 patent including the claims of the '587 patent.

- 4. The preparation, filing and prosecution of the application which resulted in the issuance of the '587 patent and its Related Patents or Applications.
- 5. The conception, reduction to practice, diligence up to reduction to practice and other development activities or alleged inventive activities for the subject matter of the '367 patent including the claims of the '367 patent.
- 6. The preparation, filing and prosecution of the application which resulted in the issuance of the '367 patent and its Related Patents or Applications.

#### **CERTIFICATE OF SERVICE**

I, Jack B. Blumenfeld, hereby certify that on May 16, 2006 I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

> Richard L. Horowitz, Esquire POTTER ANDERSON & CORROON LLP Hercules Plaza, 6<sup>th</sup> floor 1313 N. Market Street Wilmington, DE 19899

and that I caused copies to be served upon the following in the manner indicated:

# **BY HAND**

Richard L. Horwitz, Esquire POTTER ANDERSON & CORROON LLP Hercules Plaza, 6<sup>th</sup> floor 1313 N. Market Street Wilmington, DE 19801

### **BY FACSIMILE**

Alan M. Grimaldi, Esquire **HOWREY LLP** 1299 Pennsylvania Avenue, NW Washington, DC 20004

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